



JUL 26 2022

Michael Geoghegan  
Interim President and CEO  
Eastern Gateway Community College  
110 John Scott Highway  
Steubenville, OH 43952

Sent via email  
[mgeoghegan@egcc.edu](mailto:mgeoghegan@egcc.edu)

**Re: July 22, 2022 Letter OPE ID: 00727500**

Dear Interim President Geoghegan:

I am in receipt of your July 22, 2022, letter seeking to appeal the Department's July 18, 2022, letter to Eastern Gateway Community College (EGCC) directing the institution to cease and desist disbursing Title IV funding to students in EGCC's Free College Benefit program. As outlined in the July 18<sup>th</sup> letter, as currently implemented, the program violates the Title IV prohibition against assessing charges to Title IV recipients that are higher than those charges assessed to non-Title IV recipients.

Your letter incorrectly characterizes the Department's July 18<sup>th</sup> letter as a limitation action initiated under 20 U.S.C. § 1094 and 34 C.F.R. § 668.86. Instead, it is a cease and desist letter regarding the institution's disbursement of Title IV funds to ineligible students. At this time, the Department has not taken action to limit EGCC's participation in the Title IV programs. Therefore, there is no basis for appeal and the matter will not be forwarded to the Department's Office of Hearings and Appeals (OHA) for a hearing.

The Department is still considering information provided by EGCC and will respond to that information as soon as possible. If the Department initiates an adverse action in the future, it will notify EGCC of the institution's due process rights with regard to that action, and will provide directions on how to exercise those rights.

Sincerely,

A handwritten signature in blue ink that reads "Susan D. Crim".

Susan D. Crim  
Director  
Administrative Actions and Appeals Service Group

cc: Bonnie Graham, Brustein & Manasevit, PLLC, via [bgraham@bruman.com](mailto:bgraham@bruman.com)

**Federal Student Aid**  
An OFFICE of the U.S. DEPARTMENT of EDUCATION

Administrative Actions and Appeals Service Group  
830 First St., N.E. Washington, D.C. 20002-8019  
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